

July 7, 2004

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**CC DOCKET NO. 92-105; FCC 04-111
THE USE OF N11 CODES AND OTHER ABBREVIATED DIALING
ARRANGEMENTS**

Dear Ms. Dortch:

We would like to commend the Commission on their willingness to implement a nationwide 3 digit number for access to the nation's many one-call centers.

Public Service Electric and Gas Co. (The Company) has been actively involved over the years in damage prevention, and has worked closely with the Office of Pipeline Safety (OPS), the American Gas Association (AGA), and the Common Ground Alliance (CGA) in addressing ways to reduce the number of third party damages to buried utilities. The Company strongly supports the FCC proposal to establish a national 3-digit number to connect to the local one call centers and we agree with comments submitted by AGA and CGA. The Company can understand the CGA supporting the #344 , and also the AGA preference for the 811 option. Which ever option the FCC selects will be a definite step in the right direction in promoting public safety.

The following comments are offered:

- 1. Integration of Existing One Call Center Numbers.** The Company believes it is important to integrate the new 3-digit dialing code into the existing nationwide one-call center numbers. There has been much time and money invested in advertising the existing one-call center numbers which exist on booklets, pipeline markers, fence signs, etc. Changing all of the existing material would be excessive and unnecessary.
- 2. Originating Switch Location.** The Company supports the proposal that the NPA-NXX that originates the call should determine the One Call Center into which the number will be translated. It is understood that there will be some calls misdirected, however it is believed that this number will be low.

- 3. Timeframe for Implementation.** The most important issue here is implementing the 3-digit dialing code. The one-to-three year time frame mentioned in the notice of proposed rulemaking seems reasonable.

The Company appreciates the opportunity to comment on the proposed regulation.

Willard S. Carey
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Public Service Electric & Gas Co.